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UNITED HEALTHCARE INSURANCE COMPANY
and UNITED BEHAVIORAL HEALTH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LD, DB, BW, RH, and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITED HEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation,
UNITED BEHAVIORAL HEALTH, a
California Corporation, and MULTIPLAN,
INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR-JCS

**UNITED DEFENDANTS' REQUEST FOR
LEAVE TO FILE EXHIBIT IN SUPPORT
OF JOINT LETTER SUBMISSION
REGARDING DISCOVERY DISPUTE
PURSUANT TO L.R. 7-11**

Hon. Joseph C. Spero

Pursuant to Civil Local Rule 7-11, Defendants United Healthcare Insurance Company and United Behavioral Health (together, “United Defendants”) respectfully seek leave to file the Declaration of Rebecca Paradise (attached hereto as **Exhibit 1** as an exhibit in support of United Defendants’ position in the parties’ Joint Letter Submission Regarding Discovery Dispute (Dkt. 120) (“Joint Letter”). As explained further in the Declaration of Lauren Blas (“Blas Decl.”) attached hereto, United Defendants could not obtain a stipulation from Plaintiffs to file the exhibit with the Joint Letter brief and now seek leave of court to file it separately. *See* Blas Decl., ¶ 3.

United Defendants respectfully seek leave to file the Declaration of Rebecca Paradise as an exhibit to the Joint Letter because it provides necessary context and support for United Defendants’ arguments regarding the limited redactions to irrelevant, commercially sensitive information in United Defendants’ production. This Court’s standing order generally permits the filing of exhibits with joint letter submissions. *See, e.g., Meta Platforms v. Brandtotal Ltd.*, 2022 WL 93932 at *2 (N.D. Cal. Jan. 10, 2022) (referencing exhibit filed with joint letter brief regarding discovery dispute) (Spero, J.). Moreover, the Declaration of Rebecca Paradise may be properly considered with the Parties’ Joint Letter, as a party declaration is often used to support confidentiality designations and assertions of competitive harm, both of which are at issue in the Joint Letter. *See, e.g., Muench Photog., Inc. v. Pearson Educ., Inc.*, 2013 WL 4475900, at *4 (N.D. Cal. Aug. 15, 2013); *see also AIS GmbH Aachen Innovative Sols. v. Thoratec LLC*, 2021 WL 292173, at *3-4 (N.D. Cal. Jan. 28, 2021).

For the foregoing reasons, United Defendants respectfully request leave to file the Declaration of Rebecca Paradise as Exhibit 1 to the Joint Letter.

Dated: March 28, 2022

Respectfully submitted,

By: /s/ Lauren M. Blas

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